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7 Attorney for Michael Friedman

8
9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 MICHAEL FRIEDMAN,

15 Defendant.

Case No. 2:16-cr-103-GMN-GWF

MOTION TO CONTINUE SELF
SURRENDER DATE

Expedited Treatment Requested

16
17 COMES NOW defendant Michael Friedman, through his attorney, Assistant Federal
18 Public Defender Brenda Weksler, hereby submits this Motion to Continue Self Surrender Date.

19 DATED this 15th day of December, 2017.

20 RENE L. VALLADARES
21 Federal Public Defender

22 By: /s/ Brenda Weksler

23 BRENDA WEKSLER
24 Assistant Federal Public Defender
25 Attorney for Michael Friedman
26

1 **MEMORANDUM**

2 On July 7, 2017, Michael Friedman was sentenced to serve a term of 10 months in prison
3 (5 months in custody and 5 months of home confinement). He was ordered to self-surrender on
4 October 6, 2017. Mr. Friedman contacted undersigned requesting an extension of 2 months for
5 his self-surrender and explains the reasons in a letter to this Court (attached as sealed Exhibit
6 A). In essence, his girlfriend's surgery was continued from December 12th to December 26th.
7 The December 12th surgery date would have allowed his girlfriend the ability to be cared for by
8 Mr. Friedman for the following 3 weeks (as he currently needs to self-surrender on January 6,
9 2018). With the postponement of the surgery, Mr. Friedman would only be able to care for his
10 girlfriend, Diane Morris, for about a week. Ms. Morris has no family and very few friends that
11 can care for her, which explains the pressing need for Mr. Friedman's request to postpone his
12 self-surrender date one more time.

13 Proof of Ms. Morris' medical condition has been previously provided (and attached
14 again as sealed Exhibit B).

15 Mr. Friedman is 75 years old. He does not pose a risk of danger to this community. Nor
16 does he pose a threat of non-appearance, as evidenced by his continuous contact with
17 undersigned in relation to his need to self-surrender. Mr. Friedman will comply with this court's
18 orders irrespective of what this Court decides.

19 DATED this 15th day of December, 2017

20 Respectfully submitted,
21 RENE L. VALLADARES
22 Federal Public Defender

23 By: /s/ Brenda Weksler

24 BRENDA WEKSLER
25 Assistant Federal Public Defender
26 Attorney for Michael Friedman

27 **IT IS SO ORDERED.**

28 DATED this 4 day of January, 2018.



Gloria M. Navarro, Chief Judge
United States District Court

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That on December 15, 2017, she served an electronic copy of the above and foregoing **MOTION TO CONTINUE SELF SURRENDER DATE** (Expedited Treatment Requested) by electronic service (ECF) to the person named below:

/s/ Lauren Conklin
Employee of the Federal Public Defender